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Comparative study for Environmental Impact Assessment in Environmental Iraqi and Saudi legislation

Nada Khaleefah Alrikabi^{1*}, Abbas Oudah Alumery²

¹University of Baghdad, Baghdad, Iraq

²Ministry of Environment, Dhi Qar, Iraq.

*Email: nada715kh@yahoo.com

Abstract. Countries are developing the spatial development of their societies through the projects that they undertake in various ways, and this development may be cause great impact on the environment, which also depend on the type of development, whether industrial, agricultural, or service and after the problems that occurred as a result of development on the environment, most of the countries currently did to legislating laws Environmental and some other procedures before granting environmental approvals for the purpose of establishing spatial development projects. One of the most important of these laws and regulations is Environmental impact assessment (EIA). The environmental impact assessment in Iraq consider is modern with a comparison with the legislation in the developed world countries. The research problem is the presence of gaps and weaknesses in the law of environmental impact assessment in comparison with regional or global environmental laws, the research hypothesis supposes that regional laws for instance Saudi Arabia are more sobriety and technical instructions than Iraqi regulations. After studying laws and regulations we found that the environmental impact assessment was initiated only as an item within the Law of Protection and Improvement of the Environment in Article Ten of the Law for the Protection and Improvement of the Environment No. 27 of 2009. It does not include the sustainability principles or their detailed methods or the steps of the environmental impact assessment used internationally. The research summarized the most important recommendations that the departments (decision-makers) should follow the procedures and steps for environmental impact assessment and follow a clear methodology, in addition to legislating a special law and special instructions attached to regulations and forms that are studied in detail and covering all environmental, economic and social aspects.

1. Introduction

Most of the countries have now turned to enact environmental laws and some other measures before granting environmental approvals for the purpose of establishing spatial development projects, and the most important of these laws and regulations is the environmental impact assessment. In Iraq, the environmental impact assessment considers a novelty compared to its legislation in the developed world countries. With regard to previous studies, there is currently no study or scientific research related to the topic of comparing environmental assessment in Iraqi, Saudi, regional or global laws, as most of the studies are related to the subject of environmental impact assessment of industrial or agricultural projects, and from the above mentioned this study is considered The first is with regard to comparing legislation and laws related to environmental impact assessment in Iraq.



1.1. Research problem

The weakness of the legislation of environmental impact assessment in the laws and instructions of the Iraqi Environment ministry has resulted in difficulty in applying technical, administrative and scientific procedures, and thus many different problems arise at the present time and in the future.

1.2. Aims of research

- 1- Knowing and getting acquainted with the technical and legal environmental aspects of the environmental impact assessment legislation in Iraqi and Saudi laws.
- 2- Knowing the strengths and weaknesses of both laws and comparing them in order to inform the relevant authorities of this law to benefit from the technical and scientific aspects of regional laws.

1.3. Scope of study

The scope of the study was chosen on the regional scale, especially the countries neighboring Iraq and specifically the Kingdom of Saudi Arabia, for several reasons, including the similarity of the natural, social and economic environment, the similarity of the problems and obstacles facing the two countries, as well as the similarity of administrative and technical measures regarding investment, in addition to the recent legislation of environmental laws in the two countries.

The study was concerned with the regional scope and did not take the global scope into account, as the global legislation and laws related to the assessment of the environmental impact are very advanced and modern compared to the legislation in Iraq, as well as the different legislations related to the social, economic and aesthetic environments.

1.4. Hypothesis of research

Legislation and scientific, technical and procedural sobriety of environmental impact assessment in the laws would achieve control over pollution levels on the one hand and preserve the environment on the other hand.

1.5. Methodology of research

Using the descriptive approach by reviewing Saudi laws and comparing them with Iraqi laws.

2. Environmental Impact Assessment (EIA)

Environmental impact assessment means the process which is evaluating the effects that are likely to arise from a project or other works and that significantly affect the natural environment and the built environment. In general, the environmental assessment of projects is referred to as the EIA and the environmental assessment of programs, plans and projects as a strategic environmental assessment (SEA) [1]

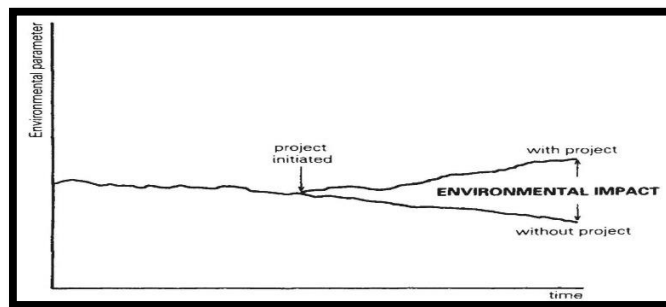


Figure 1. Environmental impacts by initiated development projects
 Wathern, Peter: " Environmental Impact Assessment: Theory And Practice ",USA,
 Routledge ,2001,p8

In order to know more accurately the concept of assessing the environmental impact, it is necessary to know the concept of environmental impact, as it means: “any changes in the characteristics of the environmental medium, or the creation of new environmental conditions beneficial or harmful by a specific and clear activity or group of activities, the environmental conditions differ from the affecting by any activity according to the different environmental activity or activities and also their size and location”. [2] The impact has both spatial and temporal components and can be represented as changes in the elements of the environment during a specific period of time and within the boundaries of a defined area resulting from a specific project, compared to the environmental situation in the event that the activity is not started (see Figure 1) [3].

By studying the figure 1, as it is clear that the establishment of any development activity, whether (industrial, agricultural, or service) will have direct or indirect effects on the environmental situation, and these effects will increase over time in the future, on the basic environmental elements that make up the environment due to its waste or emissions. The environmental impacts can vary in their characteristics depending on: [4]

- A- Type: natural, social, healthy, and economic.
- B- Nature: positive /negative, direct /indirect
- C- Amount or intensity: high, moderate, low.
- D- Extent: global, regional or local. (area /volume covered, distribution)
- E- Timing: duration construction, operation etc., immediate, delayed)
- F- Duration: temporary, permanent. (short term/long term, intermittent/continuous)
- G- Uncertainty: low likelihood, high probability.
- H- Reflectivity: reversible, non-reversible.
- I- significance: local, regional, global.

Among the most important effects that must be taken into consideration when establishing a project or a proposed development, are the effects of the environment (natural, economic, social, aesthetic), and are also classified into primary and secondary effects. As for the concept of environmental impact assessment, it means: “It is a predictive study of development projects or activities with a potential environmental impact to identify the available alternatives, evaluate their environmental impact, choose the best alternatives with the least negative environmental impacts, and propose means to mitigate (reduce) negative impacts” [5].

It is also defined as the systematic examination of the unapproved effects resulting from any project or development program in order to reduce or reduce the severity of the bad effects and the positive effects of the project, in other words, environmental impact assessment means studying and analyzing the environmental feasibility of the proposed project, which may affect the safety of the environment and human health and on water resources [6]. It is worth noting that the US Environmental Protection Agency defined it as: "An environmental impact assessment is a systematic, productive and multidisciplinary assessment of the potential effects of a proposed activity and its applied alternatives on the natural, biological, social, economic and cultural characteristics of a specific geographical area" (USEPA, 1993). (UNESCAP), and was also defined by the International Association for Impact Assessment (IAIA) and briefly: "It is the process of determining future outcomes (consequences) of a proposed or existing activity." [7]. Moreover, it has been defined as: The process of detecting the negative (harmful) and positive (beneficial) environmental impacts or sequences of comprehensive development plans, tangible and intangible, direct and indirect, immediate and future, local, regional and global in order to address or avoid harmful effects in particular and confirm the beneficial effects in order to protect the environment and development projects together" [8], since this definition, according to the researcher's opinion, is the most comprehensive and general of the other previous definitions (and we cannot fail to mention that environmental impact assessment does not mean damage to the economic reality, but on the contrary, it achieves sustainability in all its forms and that the social aspect must be present in the evaluation process to be Integrated and realistic.

2.1. The objectives and mechanisms of environmental impact assessment

Usually, the goals and objectives of the environmental impact assessment process will be included in the legislation, and the formulation of the goals changes from one country to another, but generally they include goals with an effective role and related to making the right decision, and real results related to environmental protection. [9] globally the environment is a multi-purpose process with goals that have been given long-term emphasis and promotion, which reflected and demonstrated the ideas of sustainable development. These goals included: [10], [11]

- Collecting environmental information, forecasting and showing the environmental impacts of the project.
- Maintaining valuable environmental processes and cultural heritage areas.
- Avoiding the unacceptable and irreversible loss and degradation of renewable natural resources and determining methods of avoiding, eliminating, reducing or compensating for the adverse effects.
- Ensure development that is appropriate and adapted to the capacities of basic resources.
- Optimizing the opportunities for using, managing and preserving the natural resources as far as possible.
- Address the dispersed concerns related to disruption of people's lifestyle and commercial pattern.
- Disseminating the project and the environmental impact report to the public, including a clear and non-technical summary of the environmental impacts, so that the public can play an effective role in the decision-making process.

And from the previously mentioned goals and purposes of evaluating the environmental impact, they can be divided into two types, the first type or the near (short-term) goal, which is informing the decision-maker about the expected environmental impacts and risks surrounding the proposed development projects, and the second type or the long-term goal (long-term) aims to achieve sustainable development by ensuring that the proposed development projects do not undermine ecosystems or a critical resource in the environment, which in turn affects the lifestyle and livelihood of societies who depend on these resources for their lives [12].

2.2. Steps of environmental impact assessment

The environmental impact assessment process is an essential part of the environmental development planning process, as it forms the bridge between the environmental planning and development planning processes, and based on its results it is decided whether the development project meets the environmental conditions and standards or not, and then determines the best ways to implement it within the framework of sustainable development [13], the way in which the environmental impact assessment process is implemented is not must be strict, and it consists of a series of major steps that can be summarized as follows [14] [15] (see figure 2).

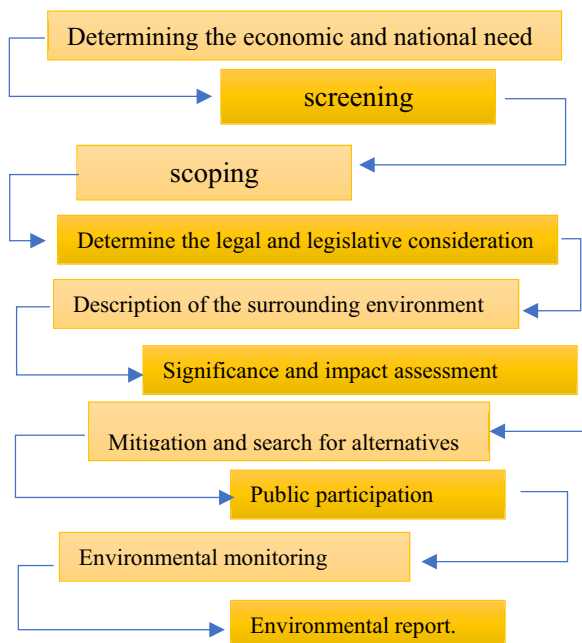


Figure 2. The diagram of steps of environmental impact assessment process

Source: research depending on references 14, 15

- 1-Determining the economic and national need for the project;
- 2- Screening
- 3- Scoping
- 4- Determine the legal and legislative considerations
- 5- Description of the surrounding environment
- 6- Significance and impact assessment
- 7- Mitigation and search for alternatives
- 8- Public participation
- 9- Environmental monitoring

10- Environmental report.

2.3. *Methods of environmental impact assessment*

Environmental impact assessment methods range from (simple to complex, requiring different types of data, different data formulas and different levels of experience and scientific and technological development for the purpose of interpretation), and analyzing these data will result in different levels of accuracy and conviction, so it must be taken into consideration. All these factors when choosing the method of evaluating the environmental impact [16], and the following are the most important common environmental impact assessment methods [17] [18]:

- 1 -Ad hoc method
- 2 -Checklists
- 3 -Matrices
- 4 -Networks
- 5 -Carrying capacity analysis
- 6 -Ecosystem analysis
- 7 -Cost-benefit assessment (cost-benefit analysis),
- 8- Compound maps and geographic information systems (GIS)

3. Historical background to environmental impact assessment legislation in Iraqi laws

Iraq is one of the first Arab countries to legislate environmental laws and legislations that were initially based on general service or awareness concepts, but their content is environmental, and among the most important instructions that regulated procedures for granting environmental licenses and approvals for service, industrial, commercial and agricultural projects that were legislated and issued as follows:

3.1. Environmental Protection and Improvement Law No. (76) of 1986

This law contains only one article that includes content related to environmental impact assessment implicitly as follows: [19]

Article 15:

D - Studying the environmental viability of project sites, setting controls for these sites, and coordinating with the planning departments for this purpose.

3.2. Environmental Protection and Improvement Law No. 3 of 1997

This law came after the previous law and contained many details and is more modern and sophisticated than the previous law despite its inheritance of many articles from the previous law and was in that time it is considered a great leap in the field of environmental work [20]

Article 12-

18 -Study and approve the environmental impact reports submitted by the authorities responsible for the projects to be established and currently existing.

Article 18:

The technical and economic feasibility study of any project must include an environmental impact report that includes the following:

First - Evaluating the environmental impact and the positive and negative impacts of the project on the environment

Second - The proposed means to avoid and treat the causes of pollution in order to achieve compliance with environmental regulations and instructions

Third - emergency and potential pollution situations and precautions to be taken.

Fourth - Possible alternatives to using cleaner technologies and rationalizing the use of resources

Fifth – Reducing waste and recycling it or re-using it whenever possible

Sixth - Estimating the costs of environmental benefits and damages caused by the project

3.3. *Law of the Ministry of Environment No. (37) of 2008*

This law consists of four chapters and fifteen articles, represented by the first chapter with definitions, foundation, and objectives; the second chapter is general definitions, while the third chapter is represented by the organizational structure.

In addition to what was mentioned above below, the most important articles and paragraphs related to environmental impact assessment:

Article One: Definitions and Terminology [21]

Environmental Impact Assessment: studying and analyzing the environmental feasibility of the proposed projects whose establishment or practice of its activities affect human health and the safety of the environment, present and future, with the aim of protecting it.

Article Four:

Fourteenth - Examining the environmental impact assessment reports submitted by the authorities responsible for the projects to be established and currently existing and approving or rejecting them according to instructions issued for this purpose

3.4. *Environment Protection and Improvement Law No. 27 of 2009*

This law consists of ten chapters and thirty-seven articles, as the first chapter includes the objectives and definitions, while the second and third chapters are concerned with the Environment Protection Council and the boards for the protection and improvement of the environment in the governorates, while the fourth chapter is the regulation for the protection of the environment and the fifth chapter includes environmental control. The sixth chapter includes a protection fund Environment and the seventh chapter included bonuses, the eighth chapter included compensation for damages, and the ninth and tenth chapters included punitive and final regulations.

Based on the foregoing, the materials related to environmental impact assessment can be listed as below:

Article 10- First: The owner of any project, before starting its construction, is obligated to submit an environmental impact assessment report that includes the following:

A- Estimating the positive and negative impacts of the project on the environment and the surrounding environment's impact on it.

B - The proposed means to avoid and treat the causes of pollution in order to achieve compliance with environmental regulations and instructions.

C - emergency and potential pollution situations and precautions that must be taken to prevent their occurrence.

D- Possible alternatives to using technology that is less harmful to the environment and rationalizing the use of resources.

E- Reducing waste and recycling it or re-using it whenever possible.

F - Estimating the environmental feasibility of the project and estimating the cost of pollution relative to production.

Second: The technical and economic feasibility study for any project includes the report stipulated in Clause (First) of this article [22].

3.5. *Instructions No. 3 of 2011*

These instructions consist of five chapters and eighty-three articles, as the first chapter includes definitions, the second chapter includes the projects class A, the third chapter on projects is class B, the fourth chapter the projects are class C and the fifth chapter general regulation.

In view of the mentioned above, the most important articles related to environmental impact assessment can be summarized as below: [23]

Environmental determinants of project creation and safety of implementation

Article 1:

Environmental requirements: the methods that must be available in the project as part of its components and in the production process, which ensures the reduction of pollution resulting from the project in accordance with standards approved by the Ministry

Article 2: Projects are classified according to their environmental impacts into three categories, according to the Ministry's discretion, as follows:

First: Class (A): Projects that have significant environmental impacts that affect vulnerable organisms and include resettlement or affect cultural heritage sites or a large area beyond work sites.

Second: Category (B): Projects that have negative, irreversible, environmental impacts on living organisms that pertain to a specific site.

Third - Category (C): Projects that have little or no negative environmental impacts.

Article 79: The environmental impact assessment report stipulated in Article (10) of the Environmental Protection and Improvement Law No. 27 of 2009 is mainly based on dealing with project sites that are not stipulated in these instructions.

4. Evaluating the environmental impact assessment in Saudi legislation and laws

4.1. General Environment Law the Executive Regulations for the year 1422 AH

4.1.1. General Environment Regulations

This system consists of the general system for the environment as it consists of four chapters and twenty-four articles, which are represented in the first chapter, definitions and objectives, the second chapter, tasks and obligations, while the third chapter includes violations and penalties, while the fourth chapter represents general regulation [24].

From the above, we would like to explain the most important articles related to environmental impact assessment, as below:

Article 1:

18 -Project Environmental Assessment: The study that is conducted to determine potential environmental impacts or

Resulting from the project and the appropriate procedures and means to prevent or reduce the negative effects and achieve or increase the positive returns of the project on the environment in accordance with the environmental standards in force.

4.1.2. Executive Regulations

The executive regulations also consist of four chapters and twenty-two articles, and five appendices, as the first chapter represents definitions and objectives, the second chapter represents the tasks and obligations, the third chapter violation and the penalties and the fourth chapter represent general regulations.

As for the appendices, they represent, for example, Appendix (1) environmental protection standards, while Appendix (2) represents the principles and standards for assessing the environmental impacts of industrial and development projects which subdivided into an appendix (2.1) which include a guide of classification of the industrial and developmental project and appendix (2-2) include environmental impact assessment for development project (information form of category A), while appendix 2-3 Environmental Assessment for Projects Second Category 2, while Appendix 2-4 represents guidelines for preparing an Environmental Impact Assessment Study, while Appendix 3 represents environmental rehabilitation procedures, which are subdivided into Appendix (3-1) Work Qualification Application In the field of environmental services, and 2-3 guide requirements for qualification to work in the field of

environmental services. Appendix (4), represents the rules and procedures for controlling hazardous wastes, and Appendix (5) represents the national plan to combat pollution of the marine environment with oil and other harmful substances.

From the above, materials that can be specifically related to environmental impact assessment can be included, as follows:

Fifth Article: The authorized bodies must ensure that environmental assessment studies are conducted at the stage of feasibility studies for projects that may have negative impacts on the environment, and the agency in charge of implementing the project is the body responsible for conducting environmental assessment studies in accordance with the environmental principles and standards specified by the competent authority in the regulations Executive.

1-5The public, concerned, and licensed bodies and persons responsible for implementing or Operating projects by conducting environmental assessment studies in accordance with the principles Environmental standards, standards and procedures described in Appendix No. (2.(

2-5The public, concerned and licensed authorities shall ensure that evaluation studies are conducted For projects in the stage of feasibility studies, according to the principles and standards Standards, procedures and rules described in Appendix No. (2(

3-5The licensing authority must ensure that the environmental assessment studies are conducted in a stage feasibility studies for projects according to the environmental principles and standards set out in Appendices to this regulation

4-5The concerned, public, and licensing authorities shall be bound to carry out any of the activities or work in the field of protecting and developing natural resources, or are based on various environmental issues by licensing industrial and development projects that have potentially negative environmental impacts In coordination with the competent authority to ensure commitment to conducting environmental assessment studies according to the environmental principles and standards specified in Appendix No. (2.(

5-5 The public and concerned boards and persons responsible for implementing or operating shall be established Projects by providing the competent authority on a periodic basis with evidence of its commitment to the principles of Environmental standards and procedures

4.2. *The Environmental Assessment Manual for Municipal Projects 1427 A.H.*

This guide, which was issued by the Ministry of Municipal and Rural Affairs, consists of four chapters as the first chapter represents a year, the second chapter represents environmental controls and considerations for municipal projects, the third chapter represents the technical controls and conditions for municipal project waste, and the fourth chapter represents the environmental assessment procedures for municipal projects.

This guide contains two appendices as follows: No. 1 Environmental Assessment Form / Category Two (B) projects, Appendix No. 2 representing companies, institutions and bureaus working in the field of consultancy and preparation of environmental impact assessment studies qualified by the Presidency of Meteorology and Environmental Protection [25].

The first chapter consists of definitions for the environmental impact assessment, while the second chapter consists of:

First Semester: General

2 -The aim of the environmental assessment

3 -Objectives of the guide

Chapter Two: Environmental Controls and Considerations for Municipal Projects

1 -Classification of municipal projects

2 -Classification of projects in terms of their environmental impacts

3 -Existing municipal projects

4 -Factors that are taken into consideration when analyzing the environmental interactions of category projects, the second (a) and (b) and the third category

5 -Elements of the report of the environmental assessment study for third category projects

5 Environmental controls and considerations for third category projects

Chapter Four: Environmental Assessment Procedures for Municipal Projects

1 -Environmental evaluation procedures for first category projects

2 -Procedures for environmental assessment for projects of the second category (A) and (B)

3 -Environmental evaluation procedures for third category projects

Appendices

Appendix No. (1): Environmental Assessment Form, Category Two (B) Projects

Appendix No. (2): Companies, institutions and offices working in the field of consultancy and preparation of environmental impact assessment studies qualified by the Presidency of Meteorology and Environmental Protection

5. The advantages, negatives, and gaps in the Iraqi and Saudi laws and legislations

After reviewing the historical context of environmental impact assessment legislation and its most important articles within Iraqi laws, regulations and instructions, the research has summarized the most important advantages, negatives and gaps.

1 -Iraqi law was legislated very early

2 -Organize at an early date the spatial signature of all types of development projects and divide them into multiple classes according to their environmental impacts

3 -The main responsibility for granting environmental approvals and licensing was assigned to the Iraqi Ministry of Environment only

4 -In Instructions No. 3 of 2011, an article was laid down that projects that were not mentioned in the aforementioned instructions could be treated by relying on the environmental impact report.

5 -Generality of laws, regulations and instructions

6 -The difficulty of the technical and administrative procedures to implement the instructions, and it needs for staffs with professional and scientific experience

After studying and reviewing the Saudi laws regarding environmental impact assessment legislation, the research summarized the following:

1 -There are detail and accuracy in the technical information

2 -The existence of lists of environmental impact reports and categories of development projects

3 -Responsibility distributed over more than one party

4- The executive regulations include detailed appendices with all technical and administrative information, which will facilitate the evaluation process.

6. Comparison between Iraqi and Saudi laws and legislation

For the purpose of reviewing the technical, administrative, and scientific details of the environmental assessment legislation in the laws mentioned above, in table (1) below, the research made a comparison between the two legislations from all sides.

Table 1. Comparison between Iraqi and Saudi laws

seq	subject	Iraqi environmental legislation and laws		Saudi environmental legislation and laws	
		Environmental Protection and Improvement Law No. 28 of 2009	instructions No. 3 of 2011	General System for the Environment Executive Regulations for the Year 1422 AH	Guide of environmental assessment for municipal projects 1427 AH
1	The principles of sustainability	have been covered in a very simple way	It has been covered in a very simple way	it has been covered in a detailed manner	it has been covered in detailed manner
2	Generalization and details	Ideas were general	General concepts and ideas	There is detail and ease practice	There is detail and ease practice
3	The evaluation procedures in granting approval	depend on the routine general context	depend on the routine context and according to the opinion of the employee	there are detailed procedures that do not require the opinion or diligence of the competent employee	there are detailed procedures that do not require the opinion or the discretion of the concerned employee
4	The presence of detailed appendices	the absence of appendices	the absence of appendices	the presence of detailed appendices	the presence of detailed appendices
5	E-government	the absence of any electronic sites	the absence of any electronic sites	There's a website	There's a website
6	Responsible authority	Iraqi Ministry of Environment	Iraqi Ministry of Environment in cooperation with planning and municipal departments,	General Presidency of Meteorology and Environmental Protection	Ministry of Municipal and Rural Affairs
7	Classification	it is classified in Iraq according to the environmental classification (A-B-C)	It is classified in Iraq according to the environmental classification (A-B-C).	(First, second, third category)	(First, second, third category)
8	Methods of assessment	there is no detail about the evaluation methods	depends on the environmental impact report submitted by the consulting office	the ad hoc method and the list method	the ad hoc method and the list method
9	Explanation of the components of the law	there is a simple explanation	there are simple definitions	detailed definitions of all the concepts found in the law and legislation	detailed definitions of all the concepts found in the law and legislation
10	Environmental management	there is no detail in the legislation	there is no detail in the legislation	there are details regarding the	there are details regarding the

	procedures in construction			environmental management phase in the project construction phase	environmental management phase in the project construction phase
11	Community participation	not included in the legislation	not included in the legislation	simple implication	simple implication
12	Classification of categories (approval of the environmental impact report)	A general classification of three categories and the need to submit an environmental impact report in all cases	Generally, it includes three types. Article 79 was placed within the aforementioned instructions, based on the report, the environmental impact on projects not included in the instructions	There is the first category that is not included in the submission of the environmental impact report due to its limitations, with the necessity to adhere to health and environmental conditions. The second category is to provide a specific environmental impact with specific aspects related to environmental considerations or specific technical information	The first category is not included in submitting the environmental impact report due to its limitations, with the necessity to adhere to health and environmental requirements. The second category is to provide a specific environmental impact with specific aspects related to environmental considerations or specific technical information
13	The agency responsible for preparing the report	Consulting bureaus licensed by the Ministry and the report is submitted exclusively from them	Consulting bureaus licensed by the Ministry and the report is submitted exclusively from them	There are also consulting offices licensed by the ministry, as well as the owner of the activity can submit forms	There are also consulting offices licensed by the ministry, as well as the owner of the activity can submit forms
Resource: researchers depending on Iraqi and Saudi laws and legislation which mentioned above					

7. Conclusion

1- There are many gaps in Iraqi laws in terms of procedure and application, and they need technical and scientific skills to study them and take an environmental opinion on them.

2- The environmental assessment report depends entirely on what is prepared by the consulting bureaus that prepare the report, which will not include all the environmental information that the Iraqi Ministry of Environment wishes to organize and implement within the report.

3- Existence of activities classified within the environmental classifications, which can be excluded due to their limited environmental impact in Iraqi laws.

- 4- The absence of Iraqi legislation and laws from any inclusion of sustainability principles except for their general presentation in comparison with the Saudi legislations and laws that included most of them in detail, in addition to requiring project owners to do so.
- 5- Saudi environmental laws and legislations, despite their recentness, compared to Iraqi legislations and laws, are considered more sober, accurate, detailed, and easy to implement.
- 6- One of the most important gaps in Saudi legislation and laws is the overlap in responsibilities between government agencies
- 7- Iraqi laws do not adopt a specific mechanism in the evaluation process, nor do the regulations stipulate them as well.

8. Recommendation

- 1- Updating legislation, laws, and instructions related to environmental impact assessment in order to facilitate the process of implementing its technical procedures.
- 2- Benefiting as much as possible and acquainting on Saudi legislation and laws because they have sobriety and accurate scientific, technical, and procedural details
- 3- The possibility of legislating special instructions for an environmental impact assessment that include general appendices for the three main categories (A, B, and C) in Instructions No. 3 of 2011 as well as detailed appendices for each developmental activity
- 4- The necessity of obligating the consulting bureaus in using a specific method of the environmental impact assessment methods within the report and not relying entirely on what is included in the report
- 5- Enactment of a law on an environmental impact assessment that includes accurate details and simplified assessment procedures that facilitate the process of environmental impact assessment.

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